

Wagner (U.S. Patent No. 4,980,826). Applicants respectfully traverse the rejection of these claims for the reasons set forth below.

A. CLAIMS 1 AND 21

Independent claims 1 and 21 are directed to an arrangement in which a received order for a part from one domain is expanded into its component parts (e.g., sub parts) and an order for each of the expanded component parts is communicated to another domain. Each domain is a unit of processing in a computer system corresponding to a working unit on a production line.

On the contrary, Cornett provides a maintenance system 1 which cooperates with a manufacturing system 10 that controls the operations of a plurality of production complexes (e.g., 14A . . . 14N). Maintenance system 1 includes a controller 2 having a maintenance schedule management subsystem 3, engineering change control (ECC) management subsystem 4, parts manual management subsystem 5, spares inventory management system 6, spares inventory file 8, parts manual file 7 and master maintenance schedule file 9. Maintenance system 1 is employed to facilitate maintenance of equipment at the production complexes, such as repairs of such equipment and ordering spare parts for such equipment.

The Examiner asserts that subsystem 3 teaches the claimed first domain, subsystems 5 and 7 teach the claimed second domain and subsystems 6 and 8 teach the claimed third domain. However, Cornett is simply silent as to the parts manual management subsystem 5 and associated parts manual file receiving an order for a part from the maintenance schedule management subsystem 3. The maintenance schedule management subsystem 3 deals with the scheduling of maintenance requests for the equipment at the production complexes. See Col. 10,

lines 25 to col. 12, lines 45. As such, Cornett does not teach one domain receiving an order for a part from another domain, expanding into its component parts (e.g., sub parts) the ordered part and communicating an order for each of the expanded component parts to yet another or third domain. These features are absent from Cornett and is not adequately addressed by the Examiner in the Office Action. See Office Action, pages 19-20. Again, the Examiner is applying a piecemeal rejection by arbitrarily picking and choosing portions of the cited reference.

Further, the Examiner's Response to Arguments contradicts his rationale for rejecting these claims based on Cornett. The Examiner states that "[o]f the three, 5 (2nd domain) has expansion means (Col. 9, lines 11-22 and Figs. 10A-10D (PF13, Explode Bill with no image) and communicates with 6 (third domain) which performs parts ordering (Col. 9, lines 34-36 and col. 15, line 17 through col. 16, line 16)." See Office Action page 20. As claimed, the domain which expands the received order for the part also communicates an order for each of the expanded component parts. However, the Examiner now asserts that the expansion is performed by the parts manual management subsystem 5 (the alleged second domain) and the parts ordering is performed by the spares inventory management subsystem 6, the alleged third domain. This is simply different than the claimed arrangements and is inconsistent with the Examiner's rationale on pages 4 and 5 for claim 1.

Accordingly, claims 1 and 21 and their dependent claims are believed to be patentably distinguishable over the cited reference. Reconsideration and withdrawal of the rejection of these claims are respectfully requested.

Furthermore, the dependent claims recite additional features which are further distinguishable over the cited references. For example, claim 3 recites that the means for receiving an order has means for making a comparison with data, which has been retained in a database, to determine whether an order is a new order, a modified order or re-transmission of the same order.

The Examiner acknowledges that Cornett does not disclose or suggest the above-noted feature, but believes that this feature is taught by Wagner. However, Wagner discusses contents for judging about cancellation of ordering, correction of ordering, its execution, or coincidence of ordering (col. 13, lines 30-34), but does not disclose or suggest contents of processing of the claimed domain.

Furthermore, Applicants respectfully submit that the Examiner's motivational rationale for the combination of the references is deficient. In the Office Action, the Examiner asserts that one of ordinary skill in the art would combine the references "because it would facilitate to advantageously use/employ the prevalent procedure/function/technique." (Office Action, page 19). The Examiner does not address what, if any, advantages would result from combining Cornett with Wagner or provide any support in the art for his assertions. Even assuming that such a technique is prevalent, the prevalency of a technique is an insufficient basis, in and of itself, for incorporating such a technique to Cornett. It is apparent that the Examiner is employing impermissible hindsight. Further, even assuming that the references can be combined, the resulting combination would still not disclose or suggest the claimed combination.

For these reasons, claim 3 further distinguishes over the cited references, individually or in combination.

B. CLAIMS 11, 12, 22 AND 23

Independent claims 11, 12, 22 and 23 are directed to an arrangement in which (1) a received order for a part is expanded into its component parts and an order for each of the expanded component parts is communicated to another domain and (2) communication of an order to another domain is stopped in a case where an amount of specific parts contained in inventory is greater than a required amount of specific parts. Each domain is a unit of processing in a computer system corresponding to a working unit on a production line.

As discussed above for claims 1 and 21, Cornett does not disclose or suggest the claimed receipt of an order from a domain, expansion of the received part order or communications of an order for each expanded part. It necessarily follows that Cornett along with the Examiner's allegations of inherency do not disclose or suggest the claimed stopping operation which is dependent upon the claimed expansion operation.

Further, as previously argued, Cornett as relied upon by the Examiner does not disclose or suggest stopping of an order to another domain in a case where an amount of specific parts contained in inventory is greater than a required amount of specific parts. In particular, the Examiner relies on steps 224 and 244 of Fig. 27 which relate to the operational sequence of closing ECN's. For example, in step 224, a maintenance request (MR) is suspended if a part is not under ECN control or if MR is closed but the ECN is still open. That is, Fig. 27 relates to MRs employed in updating a parts file (e.g., 7) according to engineering changes, and is simply different and unrelated to stopping an order to another domain in a case where an amount of specific parts contained in inventory is greater than a required amount of specific parts.

Applicants respectfully disagree with the Examiner's assertion that "Applicant ought to appreciate the reference's 'suspending' function infers to the 'stopping' function. . ."

As discussed above, the MR suspension refers to suspension of a maintenance request. Cornett is silent as to such a suspension stopping communication of an order to another domain or, more particularly, stopping such communication in a case where an amount of specific parts contained in inventory is greater than a required amount of specific parts.

Further, the Examiner states that it is inherent to stop the order when requisite parts' quantity (amount) is more (greater) in inventory than its requirement. The Examiner provides no support whatsoever in Cornett or any other reference for such inherency.

Accordingly, claims 11, 12, 22 and 23 and their dependent claims are believed to be patentably distinguishable over the cited reference. Reconsideration and withdrawal of the rejection of these claims are respectfully requested.

C. CLAIMS 13 AND 16

Independent claims 13 and 16 are directed to an arrangement in which (1) a received order from one domain is expanded in another domain into its component parts and (2) permission to access ordering information is controlled through control means. Each domain is a unit of processing in a computer system corresponding to a working unit on a production line.

As discussed above for claims 1 and 21, Cornett does not disclose or suggest the claimed receipt of an order from a domain or expansion of the received part order.

As acknowledged by the Examiner, Cornett also does not disclose or suggest that permission to access ordering information is controlled through control means. The Examiner alleges that this feature is well known in view of the use of passwords and ID to log onto a

network via a terminal. Applicants respectfully traverse the Examiner's apparent taking of Official Notice and respectfully request the Examiner to provide support in the art for the alleged well known feature. Further the Examiner's Official Notice taking does not address with any reasonable particularity access to ordering information and permission to access this type of information being controlled through control means.

In addition, one of ordinary skill in the art would not modify Cornett in the manner suggested by the Examiner because "it would effectively be beneficial in terms of money and time which would otherwise be needed for R&D." See Office Action, page 17. The Examiner's rationale is neither based on the teachings of any reference nor is it knowledge generally available to one of ordinary skill in the art. The Examiner's rationale does not address how incorporating the permission to access ordering information to Cornett would be "beneficial in terms of money and time."

Accordingly, claims 13 and 16 and their dependent claims are believed to be patentably distinguishable over the cited reference. Reconsideration and withdrawal of the rejection of these claims are respectfully requested.

D. CLAIM 24

Independent claim 24 is directed to an arrangement in which (1) a received order from one domain is expanded into its component parts and an order for each of the expanded component parts is communicated to another domain and (2) information relating to a part delivery in accordance with an order is inputted in a database. Each domain is a unit of processing in a computer system corresponding to a working unit on a production line.

As discussed above for claims 1 and 21, Cornett does not disclose or suggest the claimed receipt of an order from a domain, expansion of the received part order or communications of an order for each expanded part.

Accordingly, claim 24 and any dependent claims therefrom are believed to be patentably distinguishable over the cited reference. Reconsideration and withdrawal of the rejection of these claims are respectfully requested.

E. CLAIMS 9 AND 29

Independent claims 9 and 29 are directed to a parts ordering system and a program, respectively, in which a machining plan is devised based on a received order from a domain in a first network connected via a public line, expansion is performed into each component part according to the machining plan, an order plan is devised for each expanded component part and order is placed according to the order plan.

For similar reasons as discussed above for claims 1 and 21, Cornett does not disclose or suggest the claimed receipt of an order from a domain, or devising of a machining plan based on the received order. It necessarily follows that Cornett also does not disclose or suggest expansion according to the machining plan, or placing an order according to the order plan. Again, the aspects of Cornett relied upon by the Examiner relate to maintenance of equipment at the production complexes, which is simply different than the claimed arrangement.

Accordingly, claims 9 and 29 and their dependent claims are believed to be patentably distinguishable over the cited reference. Reconsideration and withdrawal of the rejection of these claims are respectfully requested.

CONCLUSION

Based on the foregoing remarks, Applicants respectfully request reconsideration and withdrawal of the rejection and allowance of this application. In the event the Examiner considers the above arguments unpersuasive, Applicants respectfully request an interview prior to issuance of a Final Office Action in order to facilitate prosecution of this application.

AUTHORIZATION

The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 13-4503, Order No. 1232-4457. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

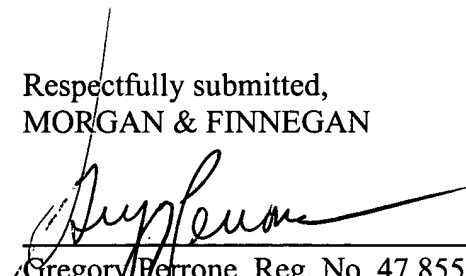
In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 13-4503, Order No. 1232-4457. A DUPLICATE OF THIS DOCUMENT IS ATTACHED.

Respectfully submitted,
MORGAN & FINNEGAN

Dated: April 11, 2003

Mailing Address:
MORGAN & FINNEGAN
345 Park Avenue
New York, New York 10154
(212) 758-4800
(212) 751-6849 Facsimile

By:


Gregory Perrone, Reg. No. 47,855 for
James Hwa, Reg. No. 42,680
(202) 857-7887 Telephone
(202) 857-7929 Facsimile